

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	§	Chapter 11 Case
	§	
Old LC, Inc., <i>et al.</i> <sup>1</sup>	§	Case No. 19-11791 (BLS)
	§	
Debtors.	§	Jointly Administered

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Official Committee of Unsecured Creditors  
of Old LC, Inc., et al., for and on behalf of  
the estates of Old LC, Inc., *et al.*;

*Plaintiff,*

v.

Upfront V, LP, Breakwater Credit  
Opportunities Fund, L.P.; Upfront GP V,  
LLC; Mark Suster; Dana Kibler; Gregory  
Bettinelli; Saif Mansour; Aamir Amdani;  
Eric Beckman; Darrick Geant; and Joseph  
Kaczorowski

*Defendants.*

Adv. No. 20-51002 (BLS)

**MOTION AND ORDER FOR ADMISSION *PRO HAC VICE***

Pursuant to Local Rule 9010-1 of the Local Rules of Bankruptcy Practice and Procedures and the attached certification, counsel moves the admission *pro hac vice* of Joel B. Bailey, of Hedrick Kring, PLLC, to represent the Official Committee of Unsecured Creditors, in the above-captioned case and any related proceedings.

Dated: November 5, 2020

**MORRIS JAMES LLP**

/s/ Jeffrey R. Waxman  
Jeffrey R. Waxman (DE Bar No. 4159)  
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Wilmington, DE 19801  
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<sup>1</sup> The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors' noticing address in these Chapter 11 cases is c/o Bryan Cave Leighton Paisner LLP, Attn: Mark I. Duedall, 1201 W. Peachtree Street, 14<sup>th</sup> Floor, Atlanta, Georgia 30309.

**CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE***

Pursuant to Local Rule 9010-1, I certify that I am eligible for admission to this Court, and am admitted, and in good standing as a member of the State of Texas. I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules and with the Standing Order for District Court Fund effective 9/1/2016. I further certify that the annual fee of \$25.00 has been paid to the Clerk of the Court for District Court.

Dated: November 5, 2020

/s/ Joel B. Bailey  
Joel B. Bailey, Esq.  
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**ORDER GRANTING MOTION**

IT IS HEREBY ORDERED that counsel's motion for admission *pro hac vice* is granted.